



June 1, 2004

Ms. Allison Ray
WSDOT
Alaskan Way Viaduct and Seawall Replacement Project Office
999 Third Avenue, Suite 2424
Seattle, WA 98104

Re: Comments on Alaskan Way Viaduct Draft Environmental Impact Statement (DEIS)

Dear Ms. Ray:

Puget Sound Energy (PSE) appreciates the opportunity to provide comments on the Alaskan Way Viaduct and Seawall Replacement Project DEIS. PSE is the largest energy supplier (natural gas and electricity) in the State of Washington. We provide natural gas services to approximately 110,000 customers within the City of Seattle. PSE has a gas service base of almost 650,000 customers in six counties.

PSE recognizes that the Alaskan Way Viaduct and Seawall Replacement Project is an extraordinary undertaking with national and regional significance. PSE strives to maintain a positive, professional and productive relationship with all the customers we serve. The relationships we have with the City of Seattle, WA State Department of Transportation (WSDOT) and USDOT's Federal Highway Administration (FHWA) are extremely important to PSE. We view these partnerships as critical to executing the work on the Viaduct and providing safe, reliable, efficient and cost-effective energy services to our customers. We support the work of these entities and the various stakeholder groups working to accomplish this project.

As part of PSE's service obligation, we are required to maintain and reinforce our natural gas system as the need arises. New growth increases demand for energy services and associated infrastructure, while decreasing available space for utility infrastructure creates hardships on our system. As part of any major transportation project requiring utility relocation, PSE must have the ability to access and maintain safe, immediate and reliable service to our customers. To do otherwise puts the reliability of our natural gas system, the general public, and our customers at risk.

Puget Sound Energy is among many utilities that have facilities on, under, or near the Viaduct and Seawall. In addition to the Viaduct's role as a major, regional transportation thoroughfare, the Viaduct corridor also acts as a major "utilidor" for many utilities (including water, sewer, steam, natural gas, telecommunications, fiber optic cables, and electricity).

Puget Sound Energy has natural gas mains, services and a supply line located under and directly proximate to the Viaduct. A 12" diameter natural gas supply pipeline serves PSE customers throughout Seattle and in other parts of King and Snohomish counties.

Multiple other distribution lines serve Seattle businesses and households along the waterfront and neighboring areas. PSE has no facilities attached to the Viaduct structure. When construction begins on a Viaduct replacement it is our understanding that some or all of our facilities may need to be relocated once or multiple times depending upon which replacement alternative is selected. Based upon the replacement options, here are some of PSE's specific comments regarding the DEIS:

1. There are many alternatives as part of this DEIS process. PSE relocation engineering will not begin until a preferred alternative is selected due to the myriad of design alternatives. After the selection of a preferred alternative, PSE will need adequate time to perform engineering duties.
2. PSE recommends the use of a master permit system to jointly permit all utilities so any potential permitting issues do not delay the overall project schedule.
3. Projects of regional significance need to address all project impacts. Utility relocation costs are a construction impact for both public and private utilities and should be included in the estimated project cost for purposes of evaluating alternatives and making public policy decisions. Moreover, environmental impacts resulting from utility relocation activities should be evaluated in this EIS, as this work relies solely on the Viaduct replacement as their justification and any replacement cannot go forward until utilities are relocated. They are in effect, a single course of action.
4. PSE and other private utility customers should not be expected to subsidize project construction costs, which result from a series of construction impacts that occur over time. This would place an unfair burden of natural gas utility relocation costs upon PSE customers.
5. Project work sequence, schedule and construction methods should be considered and designed to avoid multiple relocations of existing utilities.
6. PSE facilities need to be properly supported and protected during construction. Drilling, pile driving and other construction activities, including improving or excavating soil, also will need to be assessed in order to protect any existing natural gas facilities during construction for safety purposes. To prevent impacts to utilities and as a mitigation measure, PSE should be included in the construction planning process, especially to determine the need to have a representative on site when work occurs near our facilities.
7. PSE will need to perform normal utility maintenance activities on its facilities before, during and after any required pipeline relocations that should be considered when determining final location of facilities. Compliance with standards will need to be considered in the utility design phase of the project, including depth and separation of facilities, especially from other utilities.
8. Utility relocation plans should place a high priority on continuity and uninterrupted service to existing customers. For example, on the waterfront, PSE currently serves approximately 50 commercial customers with natural gas lines that are attached under the existing piers. Additionally, PSE's 12" diameter supply

pipeline within the proposed project area cannot be disconnected for relocation work due to PSE's regulatory obligations to provide continued service to customers. PSE requests that the lead agencies include this issue when developing their final utility relocation plan.

9. Coordination of utility relocations is part of the critical path for any of the five alternative Viaduct replacement projects. All relocations should be engineered smartly and efficiently in concert with the project calendar. Ongoing coordination and communication could be key to achieving project milestones. The FEIS should include preparation of a master utility relocation plan as a mitigation measure or significant, unavoidable, adverse impacts could occur to utilities.
10. As a result of this project, PSE may need to relocate and restore services on private property associated with this work. Any final utility plan should reflect this issue.

Thank you for the opportunity to comment on the proposed Alaskan Way Viaduct and Seawall Replacement Project DEIS. If you have any questions concerning these comments, please contact me at 425-456-2838 or susan.hempstead@pse.com.

Sincerely,

Susan Hempstead
Local Government & Community Relations Manager
PUGET SOUND ENERGY